

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

Jane Doe and John Does 1 and 2, on behalf of  
themselves and all others similarly situated,

Plaintiffs,

-against-

MasterCorp, Inc.,

Defendant.

INDEX NO. 1:24-cv-678

**MOTION FOR AN AWARD OF ATTORNEYS'  
FEES AND LITIGATION COSTS AND FOR  
CLASS REPRESENTATIVE SERVICE  
PAYMENTS**

Named Plaintiffs and Interim Class Counsel move, pursuant to this Court's Order Granting Preliminary Approval of Class and Collective Action Settlement for an award of \$1,650,000 in Attorneys' Fees, \$22,246 to date in Litigation Costs<sup>1</sup>, and for a \$7,500 Service Payment for each Named Plaintiff.

As part of the Settlement in this case, the Parties agreed that Interim Class Counsel could seek, and Defendants agreed not to oppose, this Court's approval of Attorneys' Fees not to exceed one third of the Settlement Amount.<sup>2</sup> Additionally, Interim Class Counsel agreed to seek, and Defendants agreed not to oppose, Litigation Costs exclusive of Attorneys' Fees. Interim Class Counsel estimate that the Litigation Costs request will be more than \$22,246.29 and the costs for the Notice Provider will be approximately \$100,000.

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<sup>1</sup> \$22,246 have been incurred to date. The number will be slightly higher after the Final Approval hearing, but not materially.

<sup>2</sup> The Amended Settlement Agreement is attached as Exhibit 1 to the Notice of Amendments to Settlement Agreement. Dkt. 13-1. Unless otherwise noted, all capitalized terms in this Motion carry the same meaning as set forth in the Amended Settlement Agreement.

Defendants also agreed to Service Payments of \$7,500 for the three Class Representatives who were actively engaged throughout the settlement negotiations, mediation, and Notice Period. Like the fees and costs, any service awards will be paid out of the common fund to be funded by Defendant MasterCorp, Inc.

As explained in the attached Memorandum of Law in Support of Motion for Attorneys' Fees, Litigation Costs, and Service Payments, the requested Attorneys' Fees and Litigation Costs are reasonable and compare favorably with Settlements of similar size. Likewise, the Service Payments are fair and reasonable in light of the Class Representatives' contributions to the litigation. Accordingly, Class counsel request that the Court:

1. award \$1,650,000 in Attorneys' Fees;
2. award \$22,246 in Litigation Costs, plus costs for the Class and Collective Notice Provider, which will be prior to the Fairness Hearing; and
3. award \$7,500 Service Payments to Class Representatives Jane Doe, John Doe #1, and John Doe #2.

Dated: October 18, 2024

Respectfully submitted,

/s/

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Mark Hanna (45442)

Nicolas Mendoza, *pro hac vice* submitted

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*Interim Class and Collective Action Counsel*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 18, 2024, a true and correct copy of the foregoing was furnished by electronic filing with the Clerk of the Court via CM/ECF, which will send notice of electronic filing to all counsel of record.

/s/  
Mark Hanna